

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GENLYTE THOMAS GROUP LLC,

Plaintiff/Counterclaim Defendant,
v.

ARCHITECTURAL LIGHTING SYSTEMS, a
division of ARCH LIGHTING GROUP,

Defendant/Counterclaimant.

Civil Action No. 05-CV-10945(WGY)

JOINT STATEMENT ON CLAIM CONSTRUCTION

At the request of the Court, the parties submit this Joint Statement on Claim Construction. As discussed at the Scheduling Conference, the parties believe that three terms, “downwardly and outwardly,” “oriented to direct light” and “means for ceiling-mounting said body,” will require interpretation by the court. Per the request of the Court, the parties jointly submit their respective positions on these three claim terms, and provide context for such terms, by reproducing below independent claims 1 and 3 with the disputed claim terms highlighted.

CLAIM ELEMENTS TO BE INTERPRETED

Claim Term	Plaintiff's Interpretation	Defendant's Interpretation
Downwardly and outwardly	A direction below and away from the light system.	A single direction below and outside of the body
Oriented to direct light	To set or arrange to direct light.	The highest intensity light from the fixture is emitting in a defined direction to a defined target location.

Claim Term	Plaintiff's Interpretation	Defendant's Interpretation
<p>Means for ceiling-mounting said body</p> <ul style="list-style-type: none"> • Means-plus-function? • Function • Linking text in specification • Structure to perform function 	<ul style="list-style-type: none"> • Yes • Mounting the body in or on the ceiling • "Fig. 1 is a side plan view of lighting fixture 10 shown installed in ceiling 100 directly over bed 200. Fig. 2 shows the rectangular shape of lighting fixture 10 formed by long sides 12,14 and short sides 16, 18. Long sides 12, 14 are typically four feet in length while short sides 16, 18 are typically two feet in length." • "An important feature of the present invention resides in the orientation of the lamps within the lighting 1 fixture which permits the lighting fixture 10 to be packages in a two foot by four foot configuration and thereby replace a conventional troffer." • To a person skilled in the art this discloses [a] a bottom lip/flange/edge of the body, or [b] mounting holes, and equivalents thereof. 	<ul style="list-style-type: none"> • Yes • Ceiling-mounting the light system body • The reference in the specification to a "troffer" does not disclose any structures. • No such structures are disclosed.

CLAIMS 1 AND 3

What is claimed is:

1. A medical lighting system comprising:

a body;

means for ceiling-mounting said body;

a first light fixture within said body **oriented to direct light** downwardly to a selected reading area under said body;

a second light fixture within said body **oriented to direct light downwardly and outwardly** to a vertical wall surface outwardly adjacent from said body whereby light is reflected back to a broad area under said body.

3. A medical lighting system comprising:

a body;

means for ceiling-mounting said body;

a first light fixture within said body **oriented to direct light** downwardly to a selected reading area under said body;

a second light fixture within said body **oriented to direct light downwardly and outwardly** to a vertical wall surface outwardly adjacent from said body whereby light is reflected back to a broad area under said body;

a third light fixture within said body **oriented to direct light** downwardly under said body to a selected patient examination area.

Further details of the parties' positions are set forth in their respective memoranda relating to claim interpretation previously submitted to the Court.

Respectfully submitted,

GENLYTE THOMAS GROUP LLC

By Its Attorneys,

s/ John L. Capone

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Dated: June 23, 2006

ARCH LIGHTING GROUP, INC.

By Its Attorneys,

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